

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

RECEIVED
MAY 24 2016
OFFICE OF THE SECRETARY

ADMINISTRATIVE PROCEEDING

File No. 3-17210

Honorable James E. Grimes

3-17210

-----X

In the Matter of

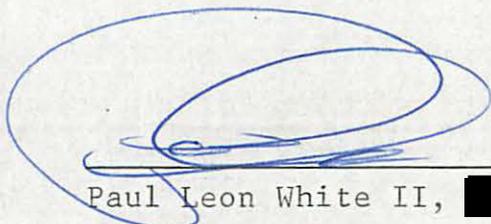
PAUL LEON WHITE II,

Respondent.

-----X

RESPONDENT'S MOTION FOR
MORE DEFINITE STATEMENT PURSUANT TO 17 C.F.R. 201.220(d)

Dated: May 16, 2016
Dannemora, NY



Paul Leon White II, [REDACTED]

Respondent Pro Se

[REDACTED]

P.O. Box [REDACTED]

Dannemora, NY [REDACTED]

BACKGROUND

On April 15, 2015, the SEC commenced an Administrative Proceeding ("PROCEEDING") by issuing an Order Instituting Proceedings ("OIP") that was served upon Respondent, Paul Leon White II, on April 21, 2016 with an Answer date of May 11, 2016 (i.e. 20 days). On or about May 1, 2016, Respondent filed a Motion to Extend Time pursuant to 17 C.F.R. §201.161 and the Administrative Law Judge ("ALJ") Honorable James E. Grimes extended Respondent's time until May 27, 2016 to Answer the OIP, pursuant to 17 C.F.R. §201.220(b). In order to expedite the PROCEEDING and allow the Respondent to adequately and effectively prepare and submit a response to the OIP, Respondent submits this Motion For More Definite Statement, pursuant to 17 C.F.R. §201.220(d).

RESPONDENT RESPECTFULLY REQUESTS THAT THE SEC PROVIDE THE FOLLOWING INFORMATION PURSUANT TO RULE 220(d)

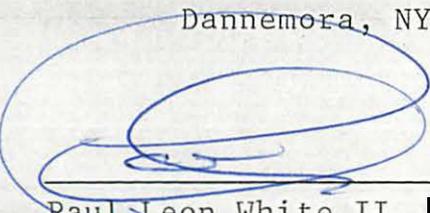
1. Any federal or state rule, regulations, or law that Respondent's company, Professional Investment Advisors Inc., was required to be registered as an Investment Advisor in the State of New York in which it is domiciled.
2. Any federal or state rule(s), regulation(s) and/or law(s) that Respondent was required to be registered as a Investment Advisor in the state of New York during the time period from June 8, 2005 and September 9, 2009 ("TIME PERIOD").
3. What specific sections the SEC claim, pursuant to Section 15(b) and or Section 203(f) of the Exchange Act and Advisors Act that Respondent is being accused of violating and/or the particular reasons why the SEC believes that it is "in the public interest" that Respondent is barred for life from the securities industry.

4. The particular rule(s), regulation(s) and/or law(s) granting the SEC authority to commence an Administrative Proceeding against Respondent, who has previously voluntarily relinquished his securities licenses as well as the specific authority that grants the SEC authority to commence an Administrative Proceeding based on real estate that is not a security. If the basis is that the real estate is considered a security by the SEC, please state so accordingly.

5. The particular rule(s), regulation(s) and/or law(s) granting the SEC the authority to commence an Administrative Proceeding against Respondent, a non-securities licensed person, to request issuance of a "lifetime ban" from the securities industry based upon a criminal conviction concerning non-securities related real estate transaction.

Dated: May 16, 2016

Dannemora, NY



Paul Leon White II, [REDACTED] 5

Respondent Pro Se

[REDACTED] [REDACTED]
P.O. Box [REDACTED]

Dannemora, NY [REDACTED]

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17210
Honorable James E. Grimes

-----X
In the Matter of

PAUL LEON WHITE II,
Respondent,

-----X

CERTIFICATE OF SERVICE
PURSUANT TO
17 C.F.R. 201.150

I, Paul Leon White II, Respondent, hereby certify that on May 16, 2016, I served the following papers by placing an original and/or true copy in a wrapper addressed to the following persons below. I personally handed the wrappers to a Correction Officer at [REDACTED] with the explicit instructions to provide the wrappers containing the papers and the ADVANCED REQUEST for postage to the Correspondence Department for mailing via First Class Mail by depositing the wrappers in a mailbox under the exclusive care and custody of the United States Postal Service. The papers served are as follows:

RESPONDENT'S MOTION FOR MORE DEFINITE STATEMENT PURSUANT TO RULE 220(d)
CERTIFICATE OF MAILING
LETTER TO ALEXANDER JANGHORBANI REQUESTING "OPEN FILE" AGREEMENT

The wrappers were addressed to the following persons:

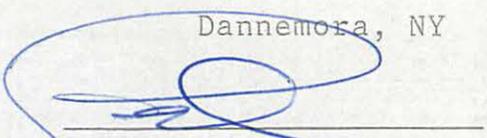
Brent Fields, Secretary
Office of Secretary
U.S. S.E.C.
100 F. Street, N.E.
Washington, DC 20549-2557
(Original and 3 Copies)

Alexander Janghobani Esq.
U.S. S.E.C.
200 Vesey Street, Suite 400
New York, NY 10281
(1 Copy)

Honorable James E. Grimes
Administrative Law Judge
U.S. S.E.C.
100 F. Street, N.E.
Washington, DC 20549-2557
(1 Copy)

Dated: May 16, 2016

Dannemora, NY


Paul Leon White II, Respondent